## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

No. 4:10-MD-02185

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No. 4:11-cv-02941

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Honorable Keith P. Ellison

BP p.l.c.,

Defendant.

# UNOPPOSED MOTION TO EXPAND PAGE LIMITS APPLICABLE TO BP'S REPLY MEMORANDUM IN FURTHER SUPPORT OF ITS MOTION TO DISMISS

#### TO THE HONORABLE UNITED STATES DISTRICT COURT:

Defendant BP p.l.c. ("BP") files this Unopposed Motion To Expand Page Limits Applicable to BP's Reply Memorandum in Further Support of its Motion to Dismiss ("Reply"), and would show as follows:

- 1. On October 26, 2011, Plaintiff filed his Memorandum in Opposition to Defendant BP's Motion to Dismiss the Class Action Complaint, which included an Unopposed Request for Leave to File an Extended Brief, and was 33 pages long exclusive of tables and cover. BP did not oppose Plaintiff's Request for Leave to File an Extended Brief.
- 2. By rule, BP's Reply is limited to 10 pages. BP of course will attempt to file as concise a Reply as possible, but has determined that additional pages are required to ensure that it can effectively present its arguments in further support of the motion to dismiss.

- 3. Plaintiff does not oppose BP's request to expand the page limit applicable to the Reply to up to 18 pages in length, exclusive of tables and cover.
- 4. Therefore, BP respectfully requests the Court allow it to file a Reply up to 18 pages in length, exclusive of tables and cover.

WHEREFORE PREMISES CONSIDERED, BP respectfully requests the Unopposed Motion to Expand Page Limits Applicable to BP's Reply Memorandum in Further Support of Its Motion to Dismiss be granted in its entirety.

Dated: November 15, 2011

#### OF COUNSEL:

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Richard C. Pepperman, II (pro hac vice) Marc De Leeuw (pro hac vice) Matthew A. Peller SULLIVAN & CROMWELL LLP 125 Broad Street New York, New York 10004 Telephone: (212) 558-4000 Respectfully submitted,

s/Thomas W. Taylor
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Attorney-in-Charge for Defendant

# CERTIFICATE OF CONFERENCE

Counsel for BP has conferred by telephone with Plaintiff's counsel and they were not opposed to the relief sought in this Motion.

s/ Marc De Leeuw
Marc De Leeuw

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Motion has been served by electronic CM/ECF filing, on this 15th day of November, 2011.

s/ Thomas W. Taylor
Thomas W. Taylor